

JOHN P. SHANNON
Nevada Bar No. 7906
JASON S. COOK
Nevada Bar No. 7965
LAW OFFICE OF WILLIAM H. JACKSON
6130 Elton Avenue
Las Vegas, Nevada 89107
Phone: (702) 489-3030
Facsimile: (702) 489-3033

Attorneys for Plaintiff
ESTEVAN ALVARADO-HERRERA

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA, SOUTHERN DIVISION

ESTEVAN ALVARADO-HERRERA, an individual;

Plaintiff,

vs.

JOSE LUIS ALVAREZ, JR, individually; R & A CARRIERS, INC., a Texas corporation; ALVARO JOSE MEDEL, individually; ONE WAY TRUCKING, LLC., a Texas Limited Liability Company; and, DOES III through X, inclusive,

Defendants.

ACUITY, A MUTUAL INSURANCE COMPANY

Intervenor.

Case No.: 2:19-cv-00748-JAD-VCF

**STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

Plaintiff ESTEVAN ALVARADO-HERRERA, Defendant R & A CARRIERS, INC., and
co-defendant ACUITY A MUTUAL INSURANCE COMPANY, by and through their respective counsel

1 of record, Stipulated to a Discovery Plan and Scheduling Order on August 2, 2019 in the parties
2 Stipulation and Order to Extend Discovery Period as follows:

3 1. **DISCOVERY CUT-OFF DATE.** The parties Stipulated to extend Discovery Cut-Off to
4 **January 28, 2020.**

5 2. **LAST DAY TO AMEND PLEADINGS AND/OR ADD PARTIES.** Shall occur ninety (90)
6 days prior to the Discovery Cut-off date – in this matter: **October 28, 2019.**

7 3. **DISCLOSURE OF EXPERTS.** The last day for disclosing experts will be sixty (60) days
8 before the close of discovery which is **November 27, 2019.**

9 4. **REBUTTAL EXPERTS.** The last day for disclosing rebuttal experts shall be thirty (30) days
10 after the disclosure of initial experts which is **December 27, 2019.**

11 5. **DISPOSITIVE MOTIONS.** The last date for filing dispositive motions shall be no later than
12 thirty (30) days after the close of discovery which is **February 28, 2020.**

13 6. **PRE-TRIAL ORDER.** The Joint Pre-Trial Order shall be filed no later than thirty (30) days
14 after the date set for the filing of dispositive motions which is **March 30, 2020.** The disclosures required
15 by F.R.C.P. 26(a)(3) and any objections thereto shall be included in the Pre-Trial Order. In the event
16 dispositive motions are filed, the filing of the Pre-Trial shall be suspended until thirty (30) days after the
17 Court enters its decision on the dispositive motion, if any.

18 7. **ALTERNATIVE DISPUTE RESOLUTION.** The parties met previously determined that the
19 possibility of using alternative dispute-resolution processes including mediation and arbitration, and the
20 parties determined it was premature to discuss such measures at this time, but will consider alternative
21 dispute resolutions as the case moves forward.

1 8. **ALTERNATIVE FORMS OF CASE DISPOSITION.** The parties considered consent to trial
2 by magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial
3 Program, and at this time do not consent to trial by magistrate or the short trial program.
4

5 9. **ELECTRONIC EVIDENCE.** The parties certified they discussed whether they intend to
6 present evidence in electronic format to jurors, and the parties determined at this time there would not
7 be any. If the parties revisit the presentation of any electronically stored information, they will file the
8 appropriate stipulation with the Court.
9

10 Plaintiff ESTEVAN ALVARADO-HERRERA filed his Amended Complaint against Defendant
11 **One Way Trucking, LLC** and Defendant **Alvaro Jose Medel** on August 29th, 2019.
12

13 Defendant **Acuity** filed its' Answer to the Amended Complaint on August 29th, 2019. Defendant
14 **R & A Carriers, Inc.** filed its' Answer to the Amended Complaint on September 10th, 2019.
15
16 ///
17 ///
18 ///
19 ///
20 ///
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

1 Defendant **One Way Trucking, LLC** was served with the Summons and Amended Complaint
2 on September 13, 2019. Defendant **Alvaro Jose Medel** was served with the Summons and Amended
3 Complaint on September 10, 2019. Neither Defendant One Way Trucking, LLC nor Defendant Alvaro
4 Jose Medel has filed an Answer to the Amended Complaint.
5

6 DATED this 14th day of October, 2019.

7 LAW OFFICE OF WILLIAM H. JACKSON

8
9 By /s/ John P. Shannon
10 JOHN P. SHANNON, ESQ.
11 Nevada Bar No. 7906
12 JASON S. COOK, ESQ.
13 Nevada Bar No. 7965
14 6130 Elton Avenue
15 Las Vegas, Nevada 89107
16 Attorney for Plaintiff

17 DATED this 14th day of October, 2019.

18 WEINBERG WHEELER HUDGINS GUNN
19 & DIAL

20 By /s/ Daniela LaBounty
21 D. LEE ROBERTS, JR., ESQ.
22 Nevada Bar No. 8877
23 DANIELA LaBOUNTY, ESQ.
24 Nevada Bar No. 13169
25 6385 S. Rainbow Blvd., Suite 400
26 Las Vegas, Nevada 89118
27 Attorney for Defendant R&A Carriers, Inc.

28 DATED this 14th day of October, 2019.

1 ROGERS MASTRANGELO CARVALHO
2 & MITCHELL

3
4 By /s/ Marissa R. Temple
5 MARISSA R. TEMPLE, ESQ.
6 Nevada Bar No. 9028
7 700 S. Third Street
8 Las Vegas, Nevada 89101
9 Attorney for Intervenor Acuity, A Mutual
10 Insurance Company

11 ///

12 ///

13 ///

14 ///

15 ///

1
2 Alvarado-Herrera vs. R&A Carriers, Inc., et al.
3 Case No. 2:19-cv-00748-JAD-VCF
4 Stipulation and Order

5 **IT IS SO ORDERED:**

6 
7

8

UNITED STATES MAGISTRATE JUDGE
9 DATED this 15th day of October, 2019

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28